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Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO  
and WILLIAM FRAZIER

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SUSIE ABRAM,

Plaintiff,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, DEPARTMENT OF  
PUBLIC HEALTH; WILLIAM FRAZIER,  
DIRECTOR OF THERAPEUTIC  
ACTIVITIES, LAGUNA HONDA  
HOSPITAL

Defendant.

Case No. C07-3006 PJH

*E-filing case*

**DECLARATION OF JONATHAN C.  
ROLNICK IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT, OR IN THE  
ALTERNATIVE SUMMARY  
ADJUDICATION AGAINST  
PLAINTIFF SUSIE ABRAM**

Date: June 18, 2008  
Time: 9:00 a.m.  
Courtroom: 3, 17<sup>th</sup> Floor  
Hon. Phyllis J. Hamilton

Action Filed: June 8, 2007

I, Jonathan C. Rolnick declare as follows:

1. I am a Deputy City Attorney for the City and County of San Francisco ("City"). I am counsel of record for the City in the above-captioned matter.
2. I am admitted to practice law in California and to appear before the court.
3. I have personal knowledge of the facts in this declaration, and if called upon to testify, I could and would testify competently to the facts contained herein.

- 1 4. Attached to this Declaration as Exhibit A are true and correct copies of excerpts of Plaintiff Susie  
2 Abram's deposition taken on February 13, 2008.
- 3 5. Attached to this Declaration as Exhibit B are true and correct copies of excerpts of Plaintiff Susie  
4 Abram's deposition taken on February 27, 2008.
- 5 6. Attached to this Declaration as Exhibit C are true and correct copies of Plaintiff's response to  
6 City's first set of special interrogatories submitted October 11, 2007.

7 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
8 knowledge. Executed on May 14, 2008, at San Francisco, California.

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12 JONATHAN C. ROLNICK  
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